

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CASE NUMBER 1:20CV66**

CARYN DEVINS STRICKLAND,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
UNITED STATES OF AMERICA, et al.,	)	
	)	
<u>Defendants.</u>	)	

**DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF'S FOURTH SET OF INTERROGATORIES**

Defendants hereby move the Court for a 14-day extension of time to respond to Plaintiff's Fourth Set of Interrogatories, from May 1, 2023 until May 15, 2023.

Good cause supports this extension. Plaintiff served 23 requests for production, 16 requests for admission, and 16 interrogatories simultaneously on March 31, 2023, the last possible date to serve requests given the close of discovery on May 1, 2023. *See* Pl.'s Fourth Set of Reqs. for Prod.; Pl.'s Third Set of Reqs. for Admis.; Pl.'s Fourth Set of Interrog. Plaintiff previously served voluminous discovery requests and Defendants have already produced thousands of pages of documents in response to them. Many of the new requests are burdensome and improperly seek records that are duplicative of those already produced in response to Plaintiff's prior discovery requests. *Compare* Request No. 81 (seeking "[d]ocuments concerning any expert witness whom Defendants expect to call at any hearing or trial in this matter") *with* Request No. 59 (seeking "[d]ocuments concerning any expert witness whom Defendants expect to call at trial"). In addition, many of the requests are complex and requiring a substantial amount of time to address. Plaintiff also waited until March 22, 2023—just over one month before the close of discovery—

to begin noticing depositions. Counsel for Defendants have, accordingly, been spending a significant amount of time and resources preparing for and participating in numerous depositions, which have all been scheduled for the final three weeks of discovery.

Nevertheless, Defendants will respond to Plaintiff's Fourth Set of Requests for Production and Third Set of Requests for Admission on or before May 1, 2023, and request an extension only to respond to Plaintiff's Fourth Set of Interrogatories. Accordingly, for all of these reasons, Defendants respectfully request that the Court grant an extension of time to respond Fourth Set of Interrogatories from May 1, 2023 to May 15, 2023.

Pursuant to Local Civil Rule 7.1(b), the undersigned has consulted with Plaintiff's counsel before filing this Motion. Plaintiff's counsel stated that Plaintiff consents to a 7-day extension, but in light of the June 1, 2023 dispositive motions deadline, Plaintiff opposes a 14-day extension.

Dated: April 24, 2023

Respectfully submitted,

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